

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

DR. PAUL M. CONTI,

Plaintiff-Counterclaim Defendant,

– against –

JOHN DOE,

Defendant-Counterclaim Plaintiff.

Case No. 17-CV-9268 (VEC)

NOTICE OF MOTION

-----X

PLEASE TAKE NOTICE that, based upon (a) the accompanying Memorandum of Law, dated March 20, 2020, and (b) the Declaration of G. William Bartholomew, dated March 20, 2020, with attached exhibits, and (c) all of the prior proceedings heretofore had herein, Plaintiff-Counterclaim Defendant Dr. Paul M. Conti will move this Court, before the Honorable Valerie E. Caproni, at the Courthouse located at 40 Foley Square, Courtroom 443, New York, New York 10007, at a date and time to be set by the Court, for an Order (a) pursuant to Rules 401, 403, and 702 of the Federal Rules of Evidence, excluding the expert reports and testimony of Dr. Paul S. Appelbaum and Dr. Ziv E. Cohen proffered by Defendant-Counterclaim Plaintiff John Doe, and (b) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 20, 2020

Yours, etc.,

JUDD BURSTEIN, P.C.

By: /s/ G. William Bartholomew
Peter B. Schalk, Esq. (PBS-8257)
G. William Bartholomew, Esq. (GB-1202)
5 Columbus Circle, Suite 1501
New York, New York 10019
Tel.: (212) 974-2400
Fax: (212) 974-2944
Email: pschalk@burlaw.com
*Attorneys for Plaintiff-Counterclaim
Defendant Dr. Paul M. Conti*

TO: Andrew G. Celli, Jr., Esq.
Katherine R. Rosenfeld, Esq.
Douglas E. Lieb, Esq.
EMERY CELLI BRINCKERHOFF & ABADY LLP
600 Fifth Avenue, 10th Floor
New York, NY 10020
Counsel for Defendant/Counter-Plaintiff John Doe